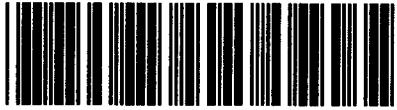




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APPLICATION OF SHARYLAND § BEFORE THE STATE OFFICE
UTILITIES, L.P. TO AMEND ITS §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY FOR THE §
PROPOSED HEREFORD TO WHITE § OF
DEER 345 KV CREZ TRANSMISSION §
LINE IN ARMSTRONG, CARSON, §
DEAF SMITH, OLDHAM, POTTER, §
AND RANDALL COUNTIES, TEXAS § ADMINISTRATIVE HEARINGS

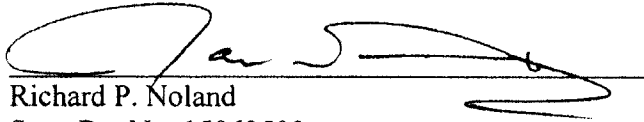
**SHARYLAND UTILITIES, L.P.'S FIRST REQUEST FOR INFORMATION
TO PROTECT NORTH PALO DURO CANYON AND THE ELKINS RANCH**

Sharyland Utilities, L.P. ("Sharyland") requests that Protect North Palo Duro Canyon and The Elkins Ranch (collectively, "PNPDC") fully respond to this first request for information ("RFI"), attached as Exhibit A to this pleading, within ten (10) days of receipt, pursuant to P.U.C. PROC. R. 22.144(c) and Order No. 1 in this proceeding.

Responses to the attached requests shall conform in all respects to the Commission's rules, including the requirement in P.U.C. PROC. R. 22.144(c)(2)(F) that they be made under oath. Responses shall identify the preparer or person under whose direct supervision each response was prepared, and the sponsoring witness, if any. Each request shall be answered separately; responses shall be preceded by the request to which the answer pertains.

Any information responsive to and any questions regarding these requests should be directed to the undersigned.

Respectfully submitted,



Richard P. Noland

State Bar No. 15063500

James M. Bushee

State Bar No. 24015071

James E. Guy

State Bar No. 24027061

SUTHERLAND ASBILL & BRENNAN LLP

701 Brazos Street, Suite 970

Austin, Texas 78701-2559

(512) 721-2700 – Telephone

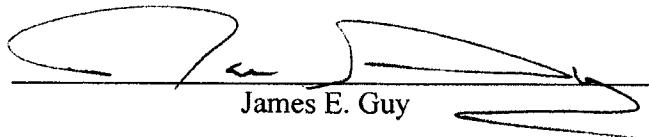
(512) 721-2656 – Facsimile

Attorneys for Sharyland Utilities, L.P.

September 1, 2010

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all parties of record on this 1st day of September 2010.



James E. Guy

**SHARYLAND UTILITIES, L.P.'S FIRST REQUEST FOR INFORMATION
TO PROTECT NORTH PALO DURO CANYON AND THE ELKINS RANCH**

General Instructions

1. In responding to each RFI, please provide information available from all corporate and individual files, as well as from all past and present employees, officers, and board members and all predecessors and affiliates, as defined below.
2. These RFIs are continuing in nature, and require supplemental responses in accordance with P.U.C. PROC. R. 22.144(i).
3. If any information is not available in the exact form requested, provide whatever information or documents that best respond to the information request.
4. If the requested information or data are available for only part of the period requested or are otherwise incomplete, please provide such data as are available.
5. If any RFI appears ambiguous, please contact counsel for Sharyland as soon as possible to obtain clarification.
6. Each document of more than one page should be stapled or otherwise bound, and the individual pages numbered consecutively.
7. If, in the case of any RFI seeking documents, there are no responsive documents, so state and provide a narrative answer to the request.
8. The terms "and" and "or" should be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of each RFI information or documents which might otherwise be considered to be beyond its scope.
9. The singular form of a word should be interpreted as plural, and the plural form of a word should be interpreted as singular, whenever appropriate, in order to bring within the scope of each data request information or documents which might otherwise be considered to be beyond its scope.
10. When the recipient of the information request is requested to provide a study, schedule, or analysis, it should also provide the workpapers, underlying facts, inferences, suppositions, estimates, and conclusions necessary to support each study, schedule, or analysis.
11. If the actual data are unavailable, but estimates or approximations are available, provide the estimates or approximations that are the best available information and explain the procedure for developing the information supplied.

**SHARYLAND UTILITIES, L.P.'S FIRST REQUEST FOR INFORMATION
TO PROTECT NORTH PALO DURO CANYON AND THE ELKINS RANCH**

Definitions

1. "Date" shall mean the exact day, month and year if ascertainable, or if not, the best approximation thereof in relation to other events.
2. To "describe," "detail," or "state" shall mean to relate as completely as possible each and every act, omission, incident, event, condition, circumstance, or thing relating directly or indirectly to the subject of the description, including all pertinent dates. These terms call for answers independent from any documents that are required in response to requests. Such answers should be in a form (*e.g.*, narrative, tabular, etc.) appropriate to a complete response to the request.
3. The terms "document" or "documents" are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced or reproduced by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, e-mail, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche and any other data compilations from which information can be obtained and translated, by you if necessary, into reasonably usable form. "Document" or "documents" shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.
4. "Each" shall be construed to include the word "every" and "every" shall be construed to include the word "each."
5. "Elkins Ranch" or "Elkins" refers to, for purposes of these RFIs, The Elkins Ranch, and any merged, consolidated, or acquired predecessors or predecessor in interest, its subsidiaries, past or present, and its employees, officers, directors, agents, consultants, and all persons acting under contractual arrangements with, or purporting to act on its behalf.
6. To "explain" means to make known in detail, to make clear the cause or reason of and account for each act, omission, incident, event, condition, circumstance, decision, and/or thing relating directly or indirectly to the subject of the explanation including all pertinent dates. This term calls for answers independent from any documents that are required in response to requests. Such answers should be in a form (*e.g.*, narrative, tabular, etc.) appropriate to a complete response to the request.

**SHARYLAND UTILITIES, L.P.'S FIRST REQUEST FOR INFORMATION
TO PROTECT NORTH PALO DURO CANYON AND THE ELKINS RANCH**

7. To “identify” a person means to include his or her full name, including middle name or initial, his or her employer or other organizational affiliation at the date of the relevant transaction or event and at the present, his or her title and duties in the company or other organization with which he or she was then affiliated and is now affiliated, and his or her last known business address and telephone number or if not available last known residence address and telephone number.
8. “Identification” of, or to “identify,” a document means to provide facts sufficient to establish the identity of the document or other thing(s) at issue, such as (a) the type or nature of the document (*e.g.*, letter, memorandum, corporate minutes), (b) the data, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who wrote, dictated, or otherwise participated in the writing of the document, (h) the identity of each person who signed or initialed the document, (i) the identity of each person to whom the document was addressed, (j) the present location of the document; and (k) the identity of each person having custody of, or control over, the document. Identification of the document includes identifying all documents known or believed to exist, whether or not in the custody of its attorneys or other representatives. The final version and each draft of each document should be identified and produced separately. If a document is no longer in your possession or control, state what disposition was made of it. A document need not be identified if it is produced.
9. The term “including,” or one of its inflections, means and refers to “including but not limited to.”
10. “Person” refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or *ad hoc*), joint venture, cooperative, municipality, commission, or governmental body or agency.
11. “Protect North Palo Duro Canyon” refers to, for purposes of these RFIs, Protect North Palo Duro Canyon, and any merged, consolidated, or acquired predecessors or predecessor in interest, its subsidiaries, past or present, its members, and its employees, officers, directors, agents, consultants, and all persons acting under contractual arrangements with, or purporting to act on its behalf.
12. “Relating to” or “relates to” means comprising, embodying, addressing, presenting, discussing, concerning, referring to, pertaining to, regarding, containing, reflecting, evidencing, describing, showing, identifying, providing, disproving, consisting of, supporting, contradicting, commenting upon, analyzing, or mentioning in any way.

**SHARYLAND UTILITIES, L.P.'S FIRST REQUEST FOR INFORMATION
TO PROTECT NORTH PALO DURO CANYON AND THE ELKINS RANCH**

Requests for Information

SU-PNPDC 1-1

Please provide copies of all documents on which Mary Corrigan relied in connection with preparing her Direct Testimony or which formed the basis for her opinions and recommendations set forth in that Direct Testimony.

SU-PNPDC 1-2

Please identify each area in which Ms. Corrigan is proffered as an expert.

SU-PNPDC 1-3

(Direct Testimony of Ms. Corrigan, Page 5, lines 5-7) – Please state whether any of Sharyland’s proposed alternative transmission line routes cross the Elkins Ranch. If any routes do cross the Elkins Ranch, please indicate the approximate locations of the lines on the map requested by SU-PNPDC 1-5 below.

SU-PNPDC 1-4

Please state when PNPDC was formed and identify the principal organizer or organizers of the group.

SU-PNPDC 1-5

(Direct Testimony of Ms. Corrigan, Page 4, lines 12-19) – Please provide an accurate scaled map with compass directions showing the boundaries of the Elkins Ranch on an aerial or U.S.G.S. topographic base map.

SU-PNPDC 1-6

(Direct Testimony of Ms. Corrigan, Page 4, lines 12-19) – Please provide the total size of the Elkins Ranch in acres.

SU-PNPDC 1-7

(Direct Testimony of Ms. Corrigan, Page 7, line 14 through page 9, line 7) – Please provide a location map and a written description of all roads and jeep trails used for the jeep tours and other activities described in Ms. Corrigan’s Direct Testimony, including but not limited to the “Black Hawk Tour,” “Hidden Spring Tour,” “Spirit of Palo Duro Tour,” “Cowboy Morning” breakfast, “Chuck Wagon Supper,” and “Old West Shows.”

**SHARYLAND UTILITIES, L.P.'S FIRST REQUEST FOR INFORMATION
TO PROTECT NORTH PALO DURO CANYON AND THE ELKINS RANCH**

SU-PNPDC 1-8

(Direct Testimony of Ms. Corrigan, Page 7, line 14 through Page 9, line 7) – Are roads and jeep trails for all jeep tours described in Ms. Corrigan's Direct Testimony located entirely on the Elkins Ranch?

SU-PNPDC 1-9

(Direct Testimony of Ms. Corrigan, Page 7, line 14 through Page 9, line 7) – Are any roads within Palo Duro Canyon State Park used for all or portions of any of the jeep tours described in Ms. Corrigan's Direct Testimony? If so, please describe which roads within the State Park are utilized and the frequency of utilization by the jeep tours.

SU-PNPDC 1-10

(Direct Testimony of Ms. Corrigan, Page 7, line 14 through Page 9, line 7) – Please provide a listing and all documents pertaining to the formal educational experience or training in any of the biological sciences for Ms. Corrigan and all Elkins Ranch tour guides and staff.

SU-PNPDC 1-11

Please state the approximate distance that the Elkins Ranch is located from the two links that cross the Canyon (Links V and AA).